REMARKS

Claims 1-12 are currently pending in the application. Claims 13-44 have been

withdrawn. Applicants respectfully request reconsideration of the above-identified application,

in view of the following remarks.

Claim Rejections – 35 U.S.C. § 103

Claims 1-12 have been rejected under 35 U.S.C. § 103(a) over Gabber, et al. (US

Patent No. 5,961,593) ("Gabber"), in view of Alkhatib (US Patent No. 6,119,171) ("Alkhatib").

Applicants respectfully submit that independent claim 1 and the claims directly or indirectly

dependent therefrom, are patentably distinct from the cited references, for at least the reason

discussed herein.

Independent claim 1 recites, *inter alia*:

A method, comprising:
      (a)   transmitting a packet from at least one client to a
deceiver;
      (b)   transmitting the packet from the deceiver to a
controller...
      (e)   establishing a connection between the controller and a
forwarder...
      (g)   routing the packet back through the client to the
forwarder;[and]
      (h)   further processing the packet in the forwarder, where
the packet is then transmitted to a second server.

Applicants submit that the cited references do not disclose, teach or suggest at least the elements

recited in claim 1.

860035 v1

The Office Action alleges that Gabber discloses the elements recited in independent claim 1, with the exception of the domain name routing server. (See, Office Action, page 2, ¶7-page 3, ¶7). The Office Action relies on Alkhatib as allegedly disclosing the domain name routing server recited in independent claim 1. (See, Office Action, page 3, ¶8). Applicants traverse the characterization of the Gabber patent and submit that at least the elements recited in independent claim 1, are not disclosed, taught or suggested by the cited reference.

Gabber is directed to two embodiments of a method and system for using a proxy server to browse server [destination] sites anonymously. (See, Gabber et, al, Abstract). In the first embodiment of Gabber, there are certain interactions between a user site 105a, a central proxy server 110a and a remote destination site 110g, such as the "New York Tribune." (See, Gabber et, al, Fig. 2). In a second embodiment of Gabber, a user site 105a may include general processing unit 505 and local proxy system 510. Similarly, user site 105a communicates with central proxy system 110a and in turn, destination site 110g. (See, Gabber et, al., Fig. 5).

More specifically, Gabber's first embodiment implements three routines: (1) "processes site-specific substitute identifiers constructed from data specific to user 105a"; (2) "transmits the substitute identifiers to server [destination] site 110g" and (3) "a third routine removes (and possibly substitutes) portions of the browsing commands that would identify user site 105a to server [destination] site 110g." (See, Gabber, et al., Col. 6, lines 1-11). The second embodiment implements two routines: (1) constructs a particular substitute identifier from data particular to user site 105a" and (2) "transmits the particular substitute identifier to central proxy system 110a", which then retransmits the particular substitute identifier to server [destination]

- 10 -

site 110g. (See, Gabber, et al., Col. 6, lines 26-36). In both embodiments, Gabber simply discusses accepting a user request at user site 105a, creating substitute identifiers, transmitting the substitute identifiers to the proxy server 110a and relaying the request to a server [destination] site 110g.

However, Gabber does not disclose, teach or suggest at least the claimed packet pre-processing that occurs before the packet is transmitted from a forwarder/central proxy system 110a to a second server/server [destination] site 110g. Gabber does not teach or suggest transmitting a packet to a deceiver and in turn to a controller for processing as recited in independent claim 1. Furthermore, Gabber does not teach or suggest establishing a connection between the controller and the forwarder, as well as routing the packet back through the client to forwarder, as recited in independent claim 1. Applicants submit that implementing the packet pre-processing as claimed is patentably distinct from Gabber's transmission of substitute identifier information and Alkhatib's Domain Name Router, taken either alone or in combination.

Accordingly, for at least these reasons, Applicants respectfully submit that independent claim 1 is patentably distinct from the cited references. Also, for at least these reasons, Applicants submit that claims 2-12, which are directly or indirectly dependent on independent claim 1, are also patentably distinct from the cited references. Therefore, Applicants respectfully request withdrawal of this ground of rejection.

CONCLUSION

It is now believed that all pending claims are in condition for allowance. In view

of these remarks, an early and favorable reconsideration is respectfully requested.

Respectfully submitted,

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860035 v1